2 /

POSTAL RATE COMMISSION 41112 29

RECEIVED

lin: 29 | 4 13 PM *96

POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

SPECIAL SERVICES FEES AND CLASSIFICATIONS

DOCKET NO. MC96-3

FOLLOWUP INTERROGATORIES OF UNITED PARCEL SERVICE TO UNITED STATES POSTAL SERVICE WITNESS SUSAN W. NEEDHAM (UPS/USPS-T8-9 through 10) (August 29, 1996)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, United Parcel Service hereby submits the attached followup interrogatories UPS/USPS-T8-9 through 10 to United States Postal Service witness Susan W. Needham.

Respectfully submitted,

John E. McKeever Karen L. Tomlinson

Attorneys for United Parcel Service

SCHNADER, HARRISON, SEGAL & LEWIS 1600 Market Street, Suite 3600 Philadelphia, Pennsylvania 19103-4247 (215) 751-2200 FAX: (215) 751-2205

E-MAIL: ups_group@shsl.com

1913 Eye Street, Suite 600 Washington, D.C. 20006 (202) 463-2900

Of Counsel.



UPS/USPS-T8-9. Please refer to your response to Interrogatory UPS/USPS-

T8-1(a) in which you state that the authority for the Postal Service to offer insurance is

"federal law." Please provide specific and complete citations for all federal statutory and/or

regulatory provisions that authorize the Postal Service to offer insurance.

UPS/USPS-T8-10. Please refer to your response to UPS/USPS-T8-2 that an

underwriting analysis to support the Postal Service's current and proposed insurance coverages

and rates by class and subclass of mail, and by incremental insured values is "not applicable."

State fully and in detail all reasons why such an underwriting analysis is "not applicable."

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in

accordance with section 12 of the Commission's Rules of Practice and the Special Rules of

Practice in this proceeding.

Karen L. Tomlinson

Attorney for United Parcel Service

Dated: August 29, 1996

Philadelphia, Pa.